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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

RON TSUR,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

Case No. 3:21-cv-00655-SI

**STIPULATED RULE 16 MOTION TO
EXTEND DISCOVERY AND
PRETRIAL DEADLINES**

Pursuant to Fed. R. Civ. P. Rule 16 and LR 16-3(a), the parties move the Court for an order extending discovery and pretrial deadlines in this case. This motion is based on the following showing of good cause:

This matter has progressed steadily since it was filed on April 29, 2021 in United States District Court for the District of Oregon, Portland Division. On October 8, 2021, the Court partly granted Defendant's Partial Motion to Dismiss and denied Defendant's Motion to Strike, and allowed Plaintiff leave to amend his Complaint. On October 22, 2021, Plaintiff filed an Amended Complaint. The Parties stipulated that Defendant could file its Answer and Defenses on November 12, 2021, and Defendant timely did so.

The parties will exchange Initial Disclosures by December 13, 2021. Pursuant to LR 16-3(a), and based on their conferral, the parties propose the following pretrial schedule:

Deadline to Join Additional Parties or Amend Pleadings:	Defendant requests December 1, 2021. Plaintiff would like this to remain open until the Deadline to Complete Fact Discovery.
Deadline to Complete Fact Discovery	August 1, 2022
ADR Report Deadline	August 29, 2022
Deadline to File Dispositive Motions	September 29, 2022
Initial Expert Disclosure Deadline	Plaintiff seeks a date after Dispositive Motions have been resolved. Defendant proposes August 15, 2022.
Rebuttal Expert/Report Disclosure Date	Plaintiff seeks a date after Dispositive Motions have been resolved. Defendant proposes September 15, 2022.
Trial (Plaintiff anticipates 14 days - Defendant anticipates 7-10 days)	February 2023, or another date set by the Court that is 30 days or more after Dispositive Motions are resolved.

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SO STIPULATED this 22nd day of November, 2021.

/s/ Shanti Lewallen

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CERTIFICATE OF SERVICE

I certify that I served the foregoing *Stipulated Rule 16 Motion to Extend Discovery and Pretrial Deadlines* on this 22nd day of November 2021, by:

- Facsimile
- First Class Mail
- Hand-Delivery
- E-mail
- CM/ECF Service

directing a true copy thereof to Defendants' attorneys at the address(es) shown below:

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DATED this 22nd day of November, 2021.

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